



February 15, 2018

The Honorable Miguel A. Laureano Correa  
Presidente, Comision de Innovacion, Telecomunicaciones, Urbanismo e Infraestructura  
El Capitulo  
PO Box 9023431  
San Juan, PR 00901-3432

Dear Presidente Laureano:

On behalf of CTIA, the trade association of the wireless communications industry, and its member companies, including AT&T, Sprint, and T-Mobile, I write in opposition to PS 710, which would require telecommunications providers seeking certification from the TRB to file disaster recovery contingency plans with the TRB and require the TRB to approve these plans. CTIA and its member companies recognize the importance of emergency and disaster recovery planning, response, and service restoration, but this legislation threatens to expose confidential carrier information that could place wireless networks and wireless consumers at risk.

In the wake of the terrible destruction caused by Hurricanes Irma and Maria, CTIA member companies are rebuilding the mobile telecommunications networks on the island. The damage caused by these two hurricanes resulted in significant damage to the telecommunications infrastructure and the electrical grid that powers cell sites and towers all over the island. On top of the damage, many cell towers are sited in remote locations that are difficult to access when roads are blocked or flooded as they were. These dynamics resulted in Hurricane Maria knocking 90 percent of cell sites out of service.

To coordinate and prepare for recovery from the storms, wireless carriers implemented several strategies to address network reliability. Carriers deployed portable cell sites to increase network capacity when needed. Carriers also used cellular base stations on wheels (COWs), cellular base stations on light trucks (COLTs), and the first-ever use of drones - Cell on Wings - in the U.S. to help restore service in Puerto Rico. In addition, carriers deployed and used other portable equipment, including antennas, generators, switching gear, and air conditioning units. With the lack of reliable commercial power in Puerto Rico, restoring service from cell sites and towers has been very challenging and required the continued use of generators and fuel. To respond to these conditions, carriers sent planes and barges filled with supplies, including portable cell sites, fuel, generators, trucks, RVs, satellite phones, charging stations, and additional supplies to assist with the recovery efforts.

Wireless carriers have a history of promptly responding to emergencies and disasters to ensure their networks are operational as quickly as possible and restore communication



links for their consumers. Most recently, CTIA, along with its members operating in Puerto Rico, released “Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration,” which are designed to help maintain wireless service during hurricanes and other natural disasters. The initiative will enhance coordination between wireless carriers and local governments in preparing for a natural disaster or emergency and speed the restoration of wireless services in the wake of such events.

Recognizing that emergency coordination efforts will vary depending upon the event and available resources, the best practices focus on: planning before disasters and emergencies occur; coordination during and after emergencies and disasters; and education awareness campaigns. These flexible tools will enable greater coordination between wireless service providers and local governments to maintain mobile service continuity, promote resiliency efforts, and expedite restoration during and after natural disasters. These best practices build on the wireless industry’s 2016 Wireless Network Resiliency Cooperative Framework. We would encourage the Government of Puerto Rico to review these best practices and – as an alternative to PS 710 - work with the wireless industry to implement them.

Wireless carrier emergency and disaster recovery plans contain highly sensitive and confidential information. Accordingly, for national security, cybersecurity, and competitive reasons, we oppose disclosing such information to the TRB. We had serious concerns with the TRB more recently releasing such information in public forums and inappropriately sharing confidential information with vendors it hired. These instances are yet further evidence that requiring carriers to share this type of highly sensitive and confidential information with the TRB is inappropriate.

Federal agencies have sought to limit these types of sensitive disclosures. For example, after the FBI’s National Information Protection Center was warned of the use of publicly available information by criminals and terrorists to plan attacks against U.S. infrastructure, a number of federal agencies removed data and information from their websites. In fact, the Federal Communications Commission (FCC) reaffirmed that public disclosure of this type of “information about the types of equipment [a carrier] uses, the locations of the equipment, the configuration of its networks, and the methods and procedures for dealing with outages” would pose significant competitive and public safety harms.

PS 710 also requires the TRB to evaluate and approve telecommunications providers’ contingency and recovery plans when they are seeking TRB certification. We have concerns as to whether the TRB has the necessary background to evaluate such plans. Requiring the TRB to review and approve contingency plans before certifying a company to provide telecommunications services could also hinder the development of the telecommunications market and deter competition in Puerto Rico.

For these reasons, we respectfully request that you not move PS 710. As an alternative, we would encourage the committee, government agencies, and wireless carriers



operating on the island to work together to review and implement CTIA's disaster preparedness and restoration best practices. Thank you for your consideration.

Sincerely,

Gerard Keegan  
Assistant Vice President  
State Legislative Affairs